

**CAUSE NO. 22CVDC-00115**

JONATHAN UBBENGA,

*Plaintiff*

v.

TARLETON STATE UNIVERSITY,

*Defendant*§  
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§  
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§

IN THE DISTRICT COURT OF

ERATH COUNTY, TEXAS

266<sup>TH</sup> JUDICIAL DISTRICT**DEFENDANT'S ORIGINAL ANSWER  
AND  
GENERAL DENIAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant, Tarleton State University (TSU), by and through the Attorney General of Texas, and respectfully files this its Original Answer and General Denial, and would show the Court as follows:

**I.  
GENERAL DENIAL**

Defendant, Tarleton State University, asserts a general denial, as authorized by Rule 92 of the Texas Rules of Civil Procedure, to the allegations contained in Plaintiff's Original Petition and demands that Plaintiff be required to prove such allegations by a preponderance of the credible evidence as required by law.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General



GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

CHRISTOPHER D. HILTON  
Chief, General Litigation Division

/s/ Zachary L. Rhines  
ZACHARY L. RHINES  
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**ATTORNEY FOR DEFENDANT  
TARLETON STATE UNIVERSITY**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2022, *Defendant Tarleton State University's Original Answer and General Denial* was served on the following via eFileTexas.gov service:

David Fielding  
David Fielding, PC  
101 Summit Ave., Suite 1010  
Fort Worth, Texas 76102  
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**Via E-FileTexas**

**ATTORNEYS FOR PLAINTIFF**

/s/ Zachary Rhines  
ZACHARY L. RHINES  
Assistant Attorney General

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Ellen Hoopes on behalf of Zachary Rhines  
Bar No. 24116957  
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Envelope ID: 71116739  
Status as of 12/19/2022 8:33 AM CST

Associated Case Party: Tarleton State University

Name	BarNumber	Email	TimestampSubmitted	Status
Zachary L.Rhines		zachary.rhines@oag.texas.gov	12/19/2022 8:29:30 AM	SENT

Associated Case Party: Jonathan Ubbenga

Name	BarNumber	Email	TimestampSubmitted	Status
David Fielding	6974500	dfielding@fieldingpc.com	12/19/2022 8:29:30 AM	SENT